

Exhibit D

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November 3, 2021

VIA FEDERAL EXPRESS AND EMAIL

Christine Maybee
 Kutak Rock LLP
 1801 California Street Suite 3000
 Denver, CO 80202

Re: Anywhere Commerce, Inc., et al. v. Ingenico, Inc., et al., No. 1:19-cv-11457-IT

Dear Ms. Maybee:

Defendants are producing herewith a first volume of documents responsive to Plaintiffs' Second Set of Document Requests with Bates numbers IngenicoInc_0286169 through IngenicoInc_0286186 pursuant to the Stipulation and Protective Order (ECF No. 92) in this matter as well as the Stipulated Rule 502(d) Order (ECF No. 93).

The following table summarizes the items produced under cover of this correspondence:

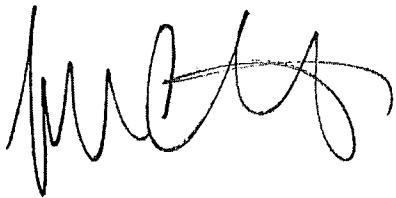
Bates Number	Model	Part Number	Serial Number
IngenicoInc_0286177	RP350x	RP350x-02T8024A	18170RP10577955
IngenicoInc_0286176	RP350x	RP350x-02T8024A	18170RP10577931
IngenicoInc_0286175	RP350x	RP350x-02T8100B	18150RP10573209
IngenicoInc_0286182	RP457c	RP457c-03T8836AW	18222RP10615778
IngenicoInc_0286183	RP457c	RP457c-03T8836AW	18222RP10614889
IngenicoInc_0286184	RP457c	RP457c-01T8802B	18286RP10654202
IngenicoInc_0286174	RP750x	RP757C-02T8500C	14189RP10000210
IngenicoInc_0286173	RP750x	RP757X-02T8511A	14127RP10000016
IngenicoInc_0286171	RP750x	RP757C-03T8508C	16214RP10000363
IngenicoInc_0286185	Moby/3000	T3N606-09110A	18317RP10696763
IngenicoInc_0286186	Moby/3000	T3N606-09110A	18310RP10685360
IngenicoInc_0286169	Moby/3000	T3N606-09103A	19014RP10768984
IngenicoInc_0286179	Moby/5500	T5N506-10003A	19011RP10766875
IngenicoInc_0286178	Moby/5500	T5N506-10003A	19011RP10766876

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IngenicoInc_0286170	Moby/5500	T5N506-10006A	19081RP10811706
IngenicoInc_0286180	Moby/8500	T8F506-09214A	18339RP10735848
IngenicoInc_0286181	Moby/8500	T8F506-09214A	18339RP10735604
IngenicoInc_0286172	Moby/8500	T8F506-09206B	18229RP10638571

Please feel free to contact me if you have any questions.

Very truly yours,



JEFFREY K. TECHENTIN
jtechentin@apslaw.com

Cc: Daniel Carmeli, Esq. (via email)

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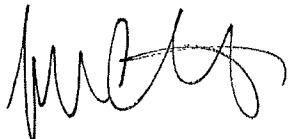
Defendants are producing herewith a third volume of documents responsive to Plaintiffs' Second Set of Document Requests with Bates numbers IngenicoInc_0306561 through IngenicoInc_0306563 pursuant to the Stipulation and Protective Order (ECF No. 92) in this matter as well as the Stipulated Rule 502(d) Order (ECF No. 93).

The following table summarizes the items produced under cover of this correspondence:

Bates Number	Model	Part Number	Serial Number
IngenicoInc_0286177	RP350x	RP350x-02T8024A	18170RP10577955
IngenicoInc_0286176	RP350x	RP350x-02T8024A	18170RP10577931
IngenicoInc_0286175	RP350x	RP350x-02T8100B	18150RP10573209

Please feel free to contact me if you have any questions.

Very truly yours,



JEFFREY K. TECHENTIN
jtechentin@apslaw.com

cc: Daniel Carmeli, Esq. (via email)